



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

MAY 4 2005

400 Seventh Street, S.W.
Washington, D.C. 20590

Ms. Julie Naus
International Traffic/Export Specialist
ICI Paints Exports & Licensing
16651 Sprague Road
Strongsville, Ohio 44136

Ref. No.: 05-0058

Dear Ms. Naus:

This responds to your February 15, 2005 letter requesting clarification concerning the use of a 1A2 steel drum containing a plastic insert with an inner receptacle under the International Maritime Dangerous Goods (IMDG) Code. Specifically you ask if this packaging configuration would be authorized under section 6.1.1.2.1 of the IMDG Code. Section 6.1.1.2.1 allows for the use of alternative packaging specifications under certain conditions including an authorization by the competent authority.

In our opinion, a removable head steel drum containing a plastic insert with an inner receptacle may be performance tested as a UN 1A2 steel drum. Once this configuration is successfully tested, in the form intended for transport, to the UN 1A2 specification it may be considered a single packaging. Therefore, section 6.1.1.2.1 is not applicable since UN 1A2 steel drums are authorized under 6.1.4 of the IMDG Code.

I hope this information is helpful. Please contact us if you require additional assistance.

Sincerely,

Hattie L. Mitchell
Chief, Regulatory Review and Reinvention
Office of Hazardous Materials Safety



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ICI Paints
16651 Sprague Road
Strongsville, Ohio 44136 USA

International
Export & Licensing

Julie Naus
Export Specialist

February 15, 2005

Mr. Bob Richard
International Standards Coordinator
U.S. Department of Transportation
Research and Special Programs Administration
DHM-5 Room 8420
400 7th Street, S.W.
Washington, DC 20590-0001

Subject: Monopack pail

Dear Mr. Richard:

Thank you for your correspondence (e-mail 01/04/05) confirming the interpretation that the Monopack pails are considered a single packaging. Based on this interpretation we understand the inner packaging orientation requirement set forth in 49 CFR 173.24a (a) (1) and 173.312 (a) (1) are not applicable. Further we understand the orientation markings requirement set forth in 173.312 (a) (2) is also not applicable.

In order to ship these containers via International carriage, specifically in accordance with the IMDG Code we respectfully request written confirmation that these containers are in compliance with IMDG regulations. In order to assist in this confirmation I suggest the written confirmation letter state the following:

We have reviewed the ICI Monopack packaging diagrams and based on the information provided we consider these innovative packagings as a single packaging and acceptable by the U.S. Department of Transportation for the transportation hazardous materials in hazard class 3 and /or hazard class 8 in packing groups II and III, including some classified as marine pollutants. Further we have reviewed the provisions set forth in IMDG Code Part 6, Chapter 6.1, Section 6.1.1.2.1 and we concur that these packaging are equally effective and able to successfully withstand the tests described in IMDG Code, Part 6 Chapter 6.1 Sections 6.1.1.2 and 6.1.5. These packagings as described and tested are acceptable to the Competent Authority for the United States and are authorized for use in accordance with 6.1.1.2.1 of the IMDG Code.

Respectfully

THE GLIDDEN COMPANY
DBA ICI PAINTS

Julie Naus
International Traffic/Export Specialist

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Applicability
05-0058

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